

Abbott requests that a full version of the Rebuttal Brief (Exhibit A) and supporting Exhibits 22 and 25 to the Gunther Apr. 12 Decl., all of which contain confidential information of the parties, be kept under seal until further order of this Court. Abbott respectfully suggests that these documents be maintained by the Clerk of the United States District Court for the District of Massachusetts in a sealed envelope, to which shall be attached the Court's Order on Sealing.

In support of this motion, Abbott states as follows:

1. Certain supporting exhibits to Abbott's Motion for Leave to File Rebuttal, including the actual Rebuttal Brief, contain information that has been designated as confidential by Abbott or Centocor and that can only be filed under seal.
2. Abbott seeks to minimize the impact of sealing information beyond what is necessary by publicly filing a redacted version of the Rebuttal Brief (Exhibit A) and full versions of certain other non-confidential exhibits through the electronic filing system.
3. The granting of this motion is otherwise in the interest of justice.
4. A draft order permitting the filing of the documents sought to be filed under seal is attached hereto.

CONCLUSION

For the foregoing reasons, Abbott respectfully requests that this motion be granted.

Respectfully Submitted,

Dated: April 12, 2011

/s/ Robert J. Gunther, Jr.

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LOCAL RULE 7.1(A)(2) CERTIFICATION

I certify pursuant to Local Rule 7.1(A)(2) that the moving party has conferred in good faith with opposing counsel on the matter set forth herein and that opposing counsel does not oppose this motion.

/s/ Robert J. Gunther, Jr. _____

CERTIFICATE OF SERVICE

I certify that, on April 12, 2011, this document (filed through the ECF system) will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

/s/ Robert J. Gunther, Jr. _____